

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LAWRENCE J. KEOHANE, JR., and	:	CIVIL ACTION
PATRICIA M. KEOHANE, Administrators	:	
for the Estate of JOSEPH P. KEOHANE,	:	NO. 07-3175
:		
Plaintiffs,	:	
:		
v.	:	JURY TRIAL DEMANDED
:		
CARRIE MCWILLIAMS, et al.,	:	
:		
Defendants.	:	

DEFENDANTS' PROPOSED VOIR DIRE

Defendants Carrie McWilliams, Edward Sutton, and Brian Weaver, by and through their undersigned counsel, Lamb McErlane PC, hereby submit the following proposed voir dire questions:

1. This case involves allegations against employees of Lancaster County Prison. Do you have any bias either for or against Lancaster County or Lancaster County Prison that would affect your ability to render a fair and impartial verdict based on the facts that will be presented?
2. Have you, a family member, or close friend ever brought a claim or lawsuit against any municipality, county, jail, prison, or correctional facility? and/or brought a claim or lawsuit against anyone for personal injuries? If so, we would like to ask you questions at sidebar.
3. Have you, a family member, or close friend ever brought a claim or lawsuit against anyone for personal injuries? If so, we would like to ask you questions at sidebar.
4. Have you, a family member, or close friend ever suffered from a serious mental illness? If so, we would like to ask you questions at sidebar.

5. Have you, a family member, or close friend ever experienced the death of a family member or close friend due to suicide? If so, we would like to ask you questions at sidebar.

6. Have you, a family member, or close friend ever experienced the death of a child? If so, we would like to ask you questions at sidebar.

7. Have you, a family member, or close friend ever been incarcerated in any jail, prison, or other correctional facility? If so, raise your hand and we would like to ask you some questions at sidebar.

8. Have you or a family member ever been employed in corrections or at a jail/prison, the law enforcement field, the judicial system, and/or any branch of the military?

9. Have you ever been a juror? If so, how many times? If so, what was the nature of the case(s)?

10. If selected to serve on this jury, you will be asked to take an oath that you will not let sympathy sway or affect your deliberations and decision. Knowing that this case involves Joseph Keohane taking his life, is there anyone who is unable to put sympathy aside and decide the case on the evidence presented?

11. Do you have any bias against governmental employees generally which would affect your ability to render a fair and impartial verdict based on the facts that will be presented?

12. Do you know of any reason why you think you could not sit in this case and render a just, fair, honest and impartial verdict?

13. Do you have any medical condition that would make it difficult for you to serve as a juror?

14. Do you have any specific obligations or problems at home or at work that would make it difficult for you to serve as a juror?

15. Is there any matter that you have not been asked that you would like to bring to the Court's attention privately because it may affect your ability to serve as a juror and/or be fair and impartial? If so, raise your hand and we would like to ask you some questions at sidebar.

Respectfully submitted,

Dated: April 30, 2012

/s/ David J. MacMain

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CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of April 2012, the foregoing Proposed Voir Dire was filed electronically and is available for viewing and downloading from the ECF system by the following parties:

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/s/ David A. Gomez

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